

HISTORIC RESOURCE PROJECT REVIEW FAQ

Can I make changes to a historic property?

Yes. Historic preservation is not meant to prevent change but rather to guide it. Palo Alto's historic review process typically focuses on permanent exterior work. It does not usually address interior work or landscaping unless it is found in Professorville National Historic District, in which case the entire streetscape is considered.

Exterior work is allowed but it must meet the Secretary of the Interior's Standards for Rehabilitation (see below). This means that in order to retain historic integrity, exterior work should not remove character defining features and should be sensitive to the historic nature of the resource.

Altering the primary street-facing façade is generally not recommended. Additions are allowed but should also meet the Standards which typically means placement off of a secondary façade or expansion of the basement (if allowed) and other secondary interior spaces. New construction, like a garage or ADU, also needs to meet the Standards and should be complimentary but secondary to the main historic building.

Do all projects need to be reviewed by the Historic Resources Board (HRB)?

No. If the work is considered minor and deemed consistent with the Secretary of the Interior's Standards for Rehabilitation by the Historic Preservation Planner, only staff level review is required. Additionally, depending on whether the property is a "Group A" or "Group B" resource (see below for definitions), permit applications and/or discretionary development applications may be reviewed by staff or the HRB, again depending on whether the work meets the Standards. Additionally, please note that the HRB application procedure is different for [single-family and duplex projects](#) than for [multi-family and commercial projects](#).

For more information on the review process, please read the [Application Review Procedures for Historic Resources and Properties that Require Historic Resource Evaluation](#) bulletin.

Who makes up the Historic Resources Board?

The HRB is composed of seven members with a demonstrated interest in and knowledge of history, architecture or historic preservation. These individuals are tasked with reviewing exterior changes to historic resources.

Please read our [Historic Resources Board](#) page for more information on the role and duties of the HRB.

What is a “Group A” historic resource?

A “Group A” historic resource is an existing property that is listed in the Palo Alto Historic Inventory and which is subject to HRB review under the City's Historic Preservation Ordinance. A “Group A” resource may also be subject to CEQA (California Environmental Quality Act) review as explained below. “Group A” resources include historic properties that meet any of the below criteria:

- Listed in the City's Inventory as Historic Category 1-2
- Listed in the City's Inventory as Historic Category 3-4 and located in the Downtown Area
- Located in one of the City's locally designated historic districts, Professorville or Ramona Street

Building permit applications involving “Group A” historic resources are routed to the Historic Resources Planner for review for compliance with the Historic Preservation Ordinance. In the case of a discretionary development application, the Historic Resources Planner also conducts review pursuant to CEQA for potential impacts to a historic resource. If review by the Historic Resources Planner indicates that the proposal does not qualify as a “minor exterior alteration” under the Historic Preservation Ordinance, or that it is not compatible with the Secretary of the Interior’s Standards for Rehabilitation, or that a potential impact to a historic resource may occur pursuant to CEQA, the Historic Resources Planner refers the application to the HRB for review and comment.

What is a “Group B” historic resource?

A “Group B” historic resource is an existing property that was previously designated or formally evaluated, and which may be subject to CEQA review as explained below. “Group B” resources are subject to HRB review if CEQA review indicates that a resource may be impacted. “Group B” resources include historic properties that meet any of the below criteria:

- Listed in the City's Inventory as Historic Category 3-4 and located outside of the Downtown Area and local historic districts
- Listed in the National Register of Historic Places (NR) or the California Register of Historical Resources (CR)
- Listed in the Palo Alto Historic Survey Update (Dames & Moore, 1997-2000) as NR-eligible or CR-eligible
- Previously determined CR-eligible through a development application review procedure

Discretionary development applications involving “Group B” historic resources are routed to the Historic Resources Planner to conduct CEQA review for potential impacts to a historic resource. Non-discretionary building permit applications are not subject to CEQA review. If review by the Historic Resources Planner indicates that a potential impact to a historic resource may occur pursuant to CEQA, the Historic Resources Planner refers the application to the HRB for review and comment.

What is a “potentially eligible” resource?

During the 2001 [Dames & Moore Historic Resources Survey Update](#), approximately 2,000 properties were deemed "potentially eligible" resources. These properties were at least 50 years old and possessed integrity, but were not obviously distinguished for architectural reasons. Many of these properties were typical examples of common local building types, such as stucco bungalows from the 1910s and 1920s, Spanish or Period Revival style houses from the 1920s and 1930s, and Ranch style tract houses from the 1940s. Many of these buildings were inexpensive when built, were designed by builders rather than architects and lacked design distinction. When these buildings met the criteria of significance, it was most often because of associations with significant historical patterns or events or with significant persons.

These resources are neither listed nor determined eligible or ineligible for listing for any inventory or register. They are potentially eligible and more research is needed to determine if the property would be considered an historic resource (see below).

When does a property require evaluation as a historic resource?

A property that has not yet been evaluated or designated may qualify as a historic resource for the purposes of CEQA review. When a development application is filed for certain properties, the City may require preparation of a Historic Resource Evaluation (HRE) report to determine CR-eligibility, in order to complete CEQA review. The City may require a HRE report when a property meets all of the conditions below:

- A discretionary development application includes demolition, new construction, new addition, or other substantial exterior alterations
- The existing development on the property is more than 45 years old
- The existing property is a single-family residence in any non-Single Family Residential zone, or a non-single family residence in any zone, is subject

In cases that meet all of the conditions listed above, applications are routed to the Historic Resources Planner to conduct CEQA review for potential impacts to a historic resource. In some cases, the Historic Resources Planner may complete an HRE. In other cases, staff may retain a professional architectural historian, compensated with funds provided to the City by the applicant, to prepare an HRE to supplement the application. If an HRE determines that a property is CR-eligible, it is classified and reviewed as a “Group B” resource. If evaluation determines that a property is not CR-eligible, it is considered to be a non-resource and reviewed accordingly.

For more information on the review process, please read the [Application Review Procedures for Historic Resources and Properties that Require Historic Resource Evaluation](#) bulletin.

What is the Historic Resources Board application review process for alterations for single-family and duplex projects?

The term "alterations" refers to proposed changes to historic fabric and also to the construction of new additions. Please see the [Historic Resources Board \(HRB\) Application Procedure for Alterations \(Single-Family and Duplex Projects\)](#) handout for detailed information.

What is the Historic Resources Board application review process for multi-family and commercial projects?

Applications involving commercial and multi-family historic properties in Categories 1-4 in the Downtown area, in Categories 1 and 2 outside Downtown, and in historic districts, are subject to discretionary design review by the Architectural Review Board (ARB) which includes referral of such applications to the Historic Resources Board for a recommendation to the Architectural Review Board (ARB). The ARB review process includes consideration of design impacts on historic resources as part of the City's environmental review under the CEQA. Consequently, the recommendation of the HRB may have a significant bearing on the ARB's recommendation. The applicant, therefore, is strongly encouraged to schedule a pre-application advisory meeting with the Historic Preservation Planner to discuss the HRB's standards of review (Secretary of the Interior's Standards for Rehabilitation) and how they may apply to the project.

Please see the [Historic Resources Board \(HRB\) Application Procedure for Alterations \(Multi-Family and Commercial Projects\)](#) handout for more information.

What are the Secretary of the Interior's Standards for Rehabilitation?

The Secretary of the Interior's Standards are common sense historic preservation principles in non-technical language. They promote historic preservation best practices that will help to protect our nation's irreplaceable cultural resources.

The [Standards for Rehabilitation](#) are used during the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural and cultural values. The Standards are:

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historical materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural

elements from other buildings, shall not be undertaken.

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

What are the benefits of historic review?

Design review is one method of protecting our important historic resources and ensuring the character of important places is preserved. Some benefits include the following:

- preservation of the unique and historic qualities of our shared environment
- creation of unique and attractive business environments
- protection of neighborhood identity
- potential eligibility for local and federal tax incentives
- a basis for making decisions that are fair
- a tool for education

For more information, please review [The Benefits of Design Review](#) by Noré V. Winter.